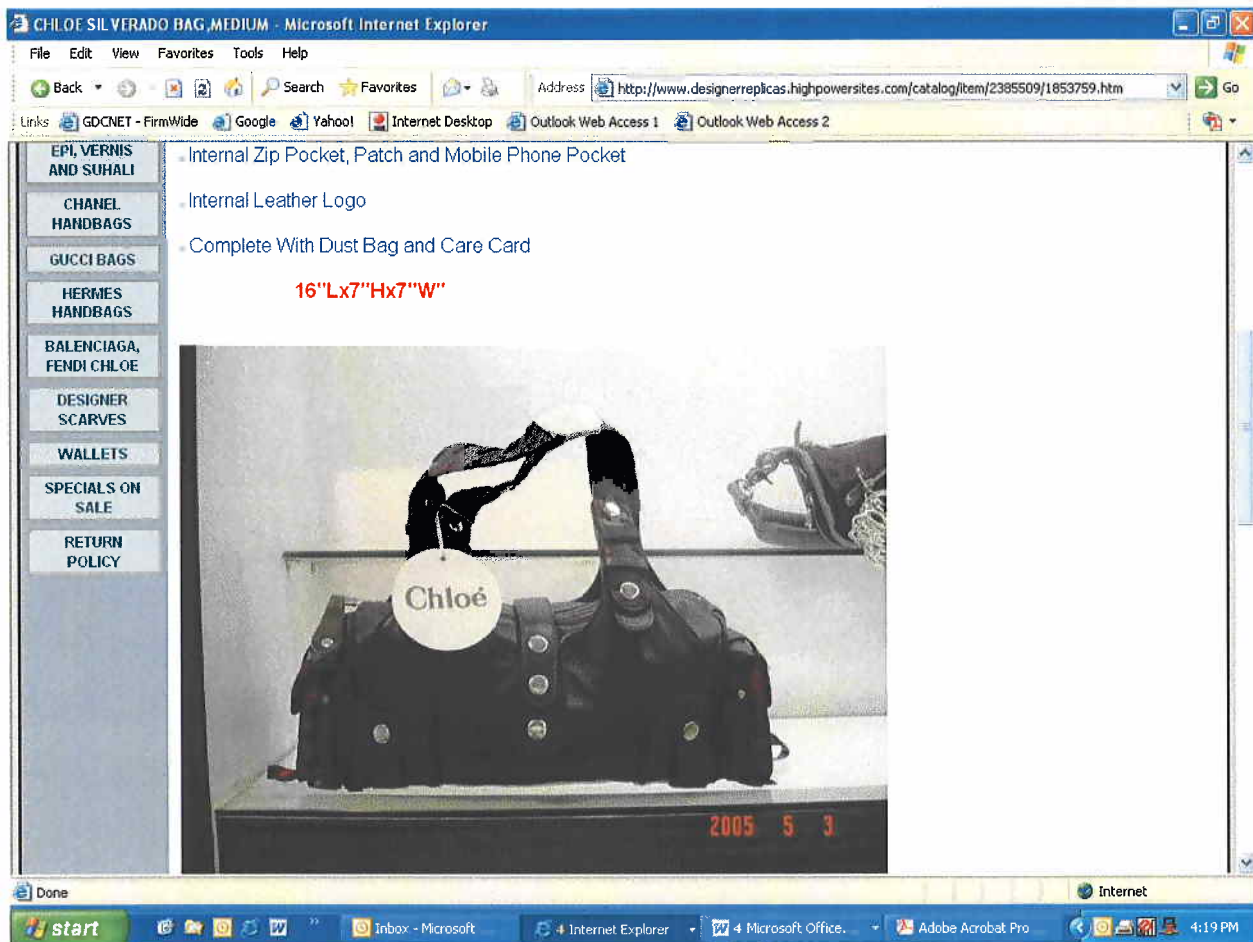
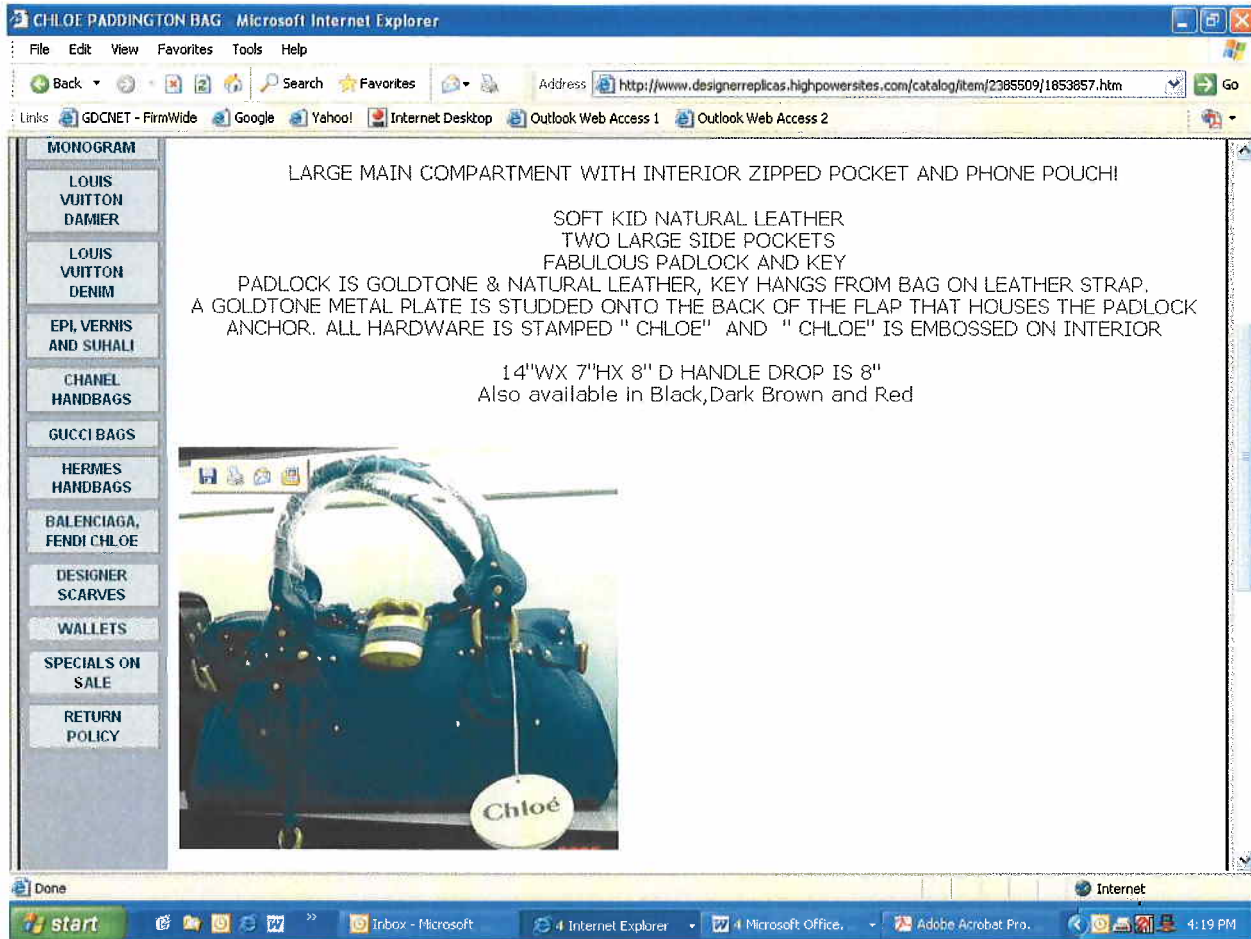


11. Below are true and accurate images of the items, as they were advertised on
www.DesignerReplicas.HighPowerSites.com.





12. I received confirmation e-mails from p5115@swbell.net, noting that the orders were placed from the website www.EZDesignerReplicas.com. Attached as Exhibit 1 is a true and correct copy of these e-mails with the recipient's identifying information obscured to protect Alaco's investigative methods.

13. Subsequently, I received the monthly statements for the Bloomindale's Insider Visa credit card and Citibank MasterCard debit card used for these purchases, which confirm a payment in the amount of \$195 for each bag. The statements each identify the recipient of these funds as HGL Enterprises and provide the location as "713-7856602 TX." The number 713-7856602 matches the phone number listed in contact information provided on both www.DesignerReplicas.HighPowerSites.com's and www.EZDesignerReplicas.com's websites.

14. I received an e-mail from “Henry Leizgold” at p5115@swbell.net informing me that both of my orders for Chloe bags had been shipped and should arrive in approximately one week. Attached as Exhibit 2 is a true and correct copy of the contents of this e-mail with the recipient’s identifying information obscured to protect Alaco’s investigative methods.

15. Below is a true and exact image of both of the handbags, as they were received. Both handbags included labels that specifically identify them as “Chloe” products.

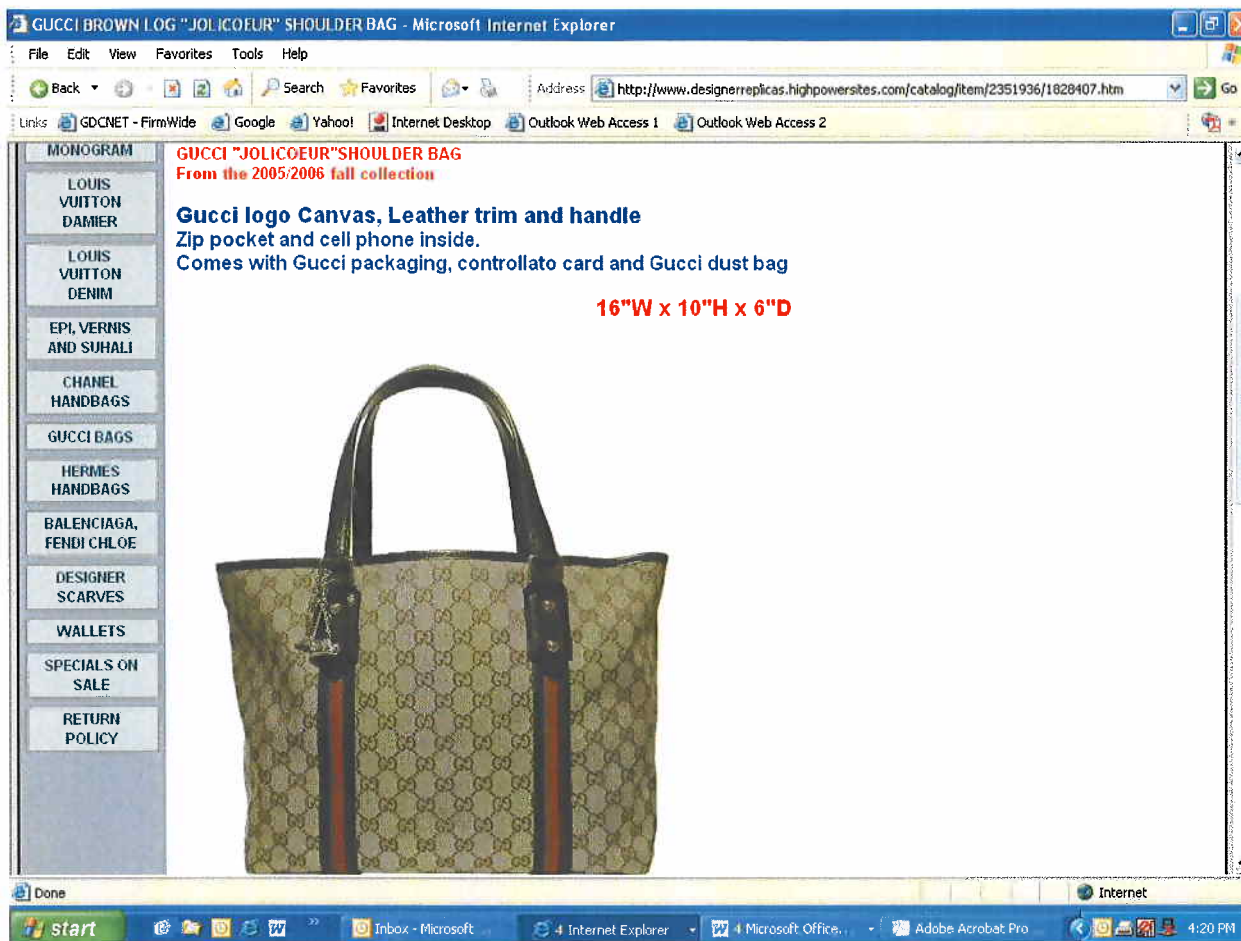




DesignerReplicas.HighPowerSites.com “Gucci” Order 809

16. I placed a mail order from the website www.DesignerReplicas.HighPowerSites.com for a “Gucci Brown Logo ‘Jolicoeur’ Shoulder Bag” with the identification number 809. The cost of the purchase of the bag was \$160, and there was no charge for shipping. I mailed the order form in accordance with the instructions on www.DesignerReplicas.HighPowerSites.com’s website. Attached as Exhibit 3 is a true and correct copy of the mail order form with the orderer’s identifying information obscured to protect Alaco’s investigative methods.

17. Below is a true and accurate image of the shoulder bag, as it was advertised on www.DesignerReplicas.HighPowerSites.com.



18. I paid for the orders through a personal check, which was processed by Washington Mutual Bank and/or Bank of America in Houston, Texas shortly after I mailed it. The check was endorsed by "H. Leizgold 0971897867." Attached as Exhibit 4 is a true and correct copy of the front and back of the processed check, with the account owner's identifying information redacted to protect Alaco's investigative methods.

19. More than one month passed after the check had been processed, and I still had not received the ordered handbag. I sent an e-mail to "nokiascr@aol.com" inquiring about the status of the order. Attached as Exhibit 5 is a true and correct copy of the contents of this e-mail (included as part of a responsive e-mail) with the sender's identifying information obscured to protect Alaco's investigative methods.

20. I received an e-mail in response to my status inquiry from "Henry Leizgold" at "p5115@swbell.net." In the e-mail, Mr. Leizgold claimed that the handbag had shipped a few weeks earlier and that he did not know why I did not receive it. Attached as Exhibit 5 is a true and correct copy of the contents of this e-mail with the recipient's identifying information obscured to protect Alaco's investigative methods.

21. Alaco never received the Gucci Jolicoeur handbag.

DesignerReplicas.HighPowerSites.com "Gucci" Order 827 and "Chloe" Order 1019

22. I placed a mail order from the website www.DesignerReplicas.HighPowerSites.com for two handbags. The first bag was identified by the website at www.DesignerReplicas.HighPowerSites.com as a "Gucci Medium Tote 2006 Cruise Line" bag with the identification number 827. The second bag was identified by the website at www.DesignerReplicas.HighPowerSites.com as a "Chloe Equestrian Kerala" bag with the identification number 1019. The cost of the purchase of each bag was \$185, and there was no charge for shipping; thus, the cost of the total purchase was \$370. I mailed the order form in accordance with the instructions on www.DesignerReplicas.HighPowerSites.com's website. Attached as Exhibit 6 is a true and correct copy of the mail order form with the orderer's identifying information obscured to protect Alaco's investigative methods.

23. Below are true and accurate images of the handbags, as they were advertised on www.DesignerReplicas.HighPowerSites.com.

GUCCI MEDIUM TOTE 2006 CRUISE LINE Microsoft Internet Explorer

File Edit View Favorites Tools Help


Back Forward Stop Search Favorites Address <http://www.designerreplicas.hiphowersites.com/catalog/item/2351936/2395205.htm#image> Go

Links GDCNET - FirmWide Google Yahoo! Internet Desktop Outlook Web Access 1 Outlook Web Access 2

VUITTON MONOGRAM
LOUIS VUITTON DAMIER
LOUIS VUITTON DENIM
EPI, VERNIS AND SUHALI
CHANEL HANDBAGS
GUCCI BAGS
HERMES HANDBAGS
BALENCIAGA, FENDI CHLOE
DESIGNER SCARVES
WALLETS
SPECIALS ON SALE
RETURN POLICY

Medium tote with detachable double straps, scarf, inside zip pocket, and cell phone pocket.
Comes with dust bag, controllo card.

15.6 x 12.2 x 5.1inches.



start Internet

Inbox - Mic... 3 Internet ... 3 Microsoft J:\Newsom)... shipping labe... 12:05 PM

CHLOE EQUESTRIAN KERALA - Microsoft Internet Explorer

File Edit View Favorites Tools Help


Back Forward Stop Search Favorites Address <http://www.designerreplicas.hiphowersites.com/catalog/item/2385509/1853656.htm#image> Go

Links GDCNET - FirmWide Google Yahoo! Internet Desktop Outlook Web Access 1 Outlook Web Access 2

LOUIS VUITTON MONOGRAM
LOUIS VUITTON DAMIER
LOUIS VUITTON DENIM
EPI, VERNIS AND SUHALI
CHANEL HANDBAGS
GUCCI BAGS
HERMES HANDBAGS
BALENCIAGA, FENDI CHLOE
DESIGNER SCARVES
WALLETS
SPECIALS ON SALE
RETURN POLICY

- Made of smooth, soft and shiny calfskin.
- Top zipper pocket.
- Coffee fabric lining
- All the golden hardware: horse, clevis, zipper is engraved with "Chloe"
- Leather tassel ties horse, clevis and leather tag.
- Come with authentic card, care booklet and dustbag.

11 2"x 6.4" x 4.4"



start Internet

Inbox - Mic... 3 Internet ... 3 Microsoft J:\Newsom)... shipping labe... 12:06 PM

24. I paid for the orders through a personal check, which was processed by Washington Mutual Bank and/or Bank of America in Houston, Texas shortly after I mailed it. The check was endorsed by "H. Leizgold." Attached as Exhibit 7 is a true and correct copy of the front and back of the processed check, with the account owner's identifying information redacted to protect Alaco's investigative methods.

25. A few weeks passed after the check had been processed, and I still had not received the ordered handbags. I sent an e-mail to "p5115@swbell.net" inquiring about the status of the order and specifically asking when the bags were expected to ship. Attached as Exhibit 8 is a true and correct copy of the contents of this e-mail with the sender's identifying information obscured to protect Alaco's investigative methods.

26. I received an e-mail in response to my status inquiry from "Henry Leizgold" at "p5115@swbell.net." In the e-mail, Mr. Leizgold explained that he had misplaced my order and asked me to resend it. Attached as Exhibit 9 is a true and correct copy of the contents of this e-mail with the recipient's identifying information obscured to protect Alaco's investigative methods.

27. After I sent a copy of my original order form to "nokiascr@aol.com," I received an e-mail from "Henry" at "p5115@swbell.net" explaining that my order had been found and that the bags would be shipped shortly. Attached as Exhibit 10 is a true and correct copy of the contents of this e-mail (included as part of a responsive e-mail) with the recipient's identifying information obscured to protect Alaco's investigative methods.

28. Below is a true and accurate image of the "Chloe" handbag, as it was received. This item included a label that specifically identifies it as a "Chloe" product.



The bag was not the style or color of bag that I ordered from the website. The return address on the package was from “Linda Leizgold,” and the apartment number at 10051 Westpark Dr. had been changed from “Apt. 240” to “Apt. 273.”

29. I received a large, red “Gucci” handbag in the mail from Beijing, China, but it was not the style or color of bag that I had ordered. The description on the shipping label stated “large shoulder bag as Birthday gift.” I sent an e-mail to Mr. Leizgold explaining that the bag that I received in the mail was not the bag that I had ordered, and that the bag I received was not even listed on his website. Attached as Exhibit 10 is a true and correct copy of the contents of this e-mail (included as part of a responsive e-mail) with the sender’s identifying information obscured to protect Alaco’s investigative methods.

30. I received an e-mail from “Henry Leizgold” at “p5115@swbell.net,” stating that the bag was sent by Mr. Leizgold. The e-mail stated that the handbag I had originally ordered was

out of stock, and so they sent a substitute bag in hopes that I would like it. The e-mail also suggested that if I did not like the handbag, I should give it as a present to someone else. Attached as Exhibit 10 is a true and correct copy of the contents of this e-mail with the recipient's identifying information obscured to protect Alaco's investigative methods.

31. Below is a true and accurate image of the "Gucci" handbag, as it was received.



This item was enclosed in packaging that specifically identifies it as a "Gucci" product.

THE INVESTIGATION INTO DEFENDANTS

32. Alaco undertook a diligent investigation of the source of the Counterfeit Products described herein using lawful means and publicly available databases.

33. Registration data for www.EZDesignerReplicas.com domain name provided by Network Solutions Inc. includes the following contact information:

Herlinda Leizgold (p5115@swbell.net)
+1 713 785 6602
10051 Westpark Dr. #240
Houston, TX 77042
US

The domain was created on October 3, 2005. Attached as Exhibit 11 is a true and correct copy of a printout from Network Solutions Inc.'s "WhoIs" record for www.EZDesignerReplicas.com.

34. The credit and debit card payment information described above included the name "HGL Enterprises" for Defendants.

35. Alaco obtained a business background report for HGL Enterprises from Dun & Bradstreet. The report includes the following contact information:

10051 W. Park Dr. STE 240
Houston, TX 77042
Telephone: 713 785-7551

The report lists Henry Leizgold as the top executive and owner of the company and describes the company's line of business as "RET MAIL-ORDER HOUSE, DATA PROCESSING/PREPARATION." The report provides that the company began its operations on October 19, 2001 and that it operates from the Leizgold's residence. The report also provides that the company's previous address was at 10881 Richmond Ave., Apt. 811, Houston, TX 77042. Attached as Exhibit 12 is a true and correct copy of a printout from Dun & Bradstreet's Business Background Report for HGL Enterprises.

36. Alaco's search of the Assumed Names Inquiry System provided by the Office of the Harris County, Texas, County Clerk identified a registration for HGL Enterprises, file number B0233570, filed on February 23, 1998. The registration lists Enrique Gosman Leizgold as the owner, with an address at 10881 Richmond Avenue, #811, Houston, TX 77042. Attached as

Exhibit 13 is a true and correct copy of a printout from the Harris County, Texas, County Clerk's "Assumed Names Inquiry" for HGL Enterprises.

37. Alaco could not identify any corporate records for DesignerReplicas.HighPowerSites.com or EZDesignerReplicas.com.

38. Defendants apparently make use of an account with Washington Mutual Bank to complete the unlawful sales described herein, as evidenced by the stamps on the processed check used to purchase "Gucci" Order 827 and "Chloe" Order 1019. See Exhibit 7. There are two stamps on the face of that check, the first of which is dated February 28, 2007. Id. The stamp on the back of the check with the corresponding date was made by Washington Mutual Bank in Houston, Texas, thus indicating that the check was originally negotiated at a Houston branch of Washington Mutual Bank. See id. The second stamp on the face of the check is dated March 2, 2007. Id. The stamp on the back of the check with the corresponding date was made by Citibank, which is the bank on which the personal check was drawn. Id. Finally, a third stamp on the back of the check was made by Bank of America on March 1, 2007. Id. Because this stamp was made between the time when the check was originally negotiated and when the funds were drawn from the paying bank, Bank of America likely serves as a representative/transfer agent of the Federal Reserve System as it moves funds from one Federal Reserve District to another (i.e., from Texas to New York). In processing the checks that I used to pay for the items that I attempted to purchase, "H. Leizgold" provided the identifying number 0971897867, which is likely an account number with Washington Mutual Bank. See Exhibit 4.

39. Aside from the financial information discussed above, Alaco could not identify records of accounts with any financial institutions in the names of DesignerReplicas.HighPowerSites.com, EZDesignerReplicas.com, HGL Enterprises, Henry

Leizgold, “Enrique Gosman Leizgold,” Herlinda Leizgold,” “Linda Leizgold,” or “Herlinda Pasapera.” Because of banking and privacy laws and the related practices of financial institutions, Alaco cannot obtain such information without an appropriate court order.

40. Alaco has also reviewed publicly available databases for information that may relate to the Defendants and made repeated attempts to learn what additional information, if any, may be available about the Defendants. Because of the nature of Defendants’ activities, such information is not easily obtained and requires repeated inquiries over time to ensure that Alaco has correctly identified the parties responsible for the Counterfeit Products.

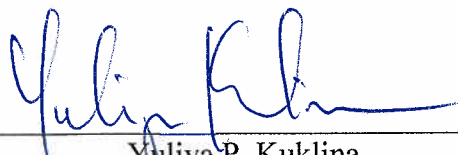
41. Alaco has not been able to find any evidence of where Defendants store or maintain their inventory of Counterfeit Products.

DEFENDANTS’ PROFITS

42. It is clear from the above-described facts that Defendants are engaged in willful and unlawful acts of trademark counterfeiting. It has been Alaco’s experience that most sellers of counterfeit trademark goods such as those of Defendants establish multiple accounts with financial institutions in multiple names with the express intent of making it difficult to find and recover the profits of their counterfeiting activities.

43. Based on this experience, it is my opinion that Defendants will likely fit within this description, and if they learn of the above-captioned action, they will take immediate steps to move all of their assets out of the accounts identified in this declaration and into other accounts that are either unknown, outside the United States, or both.

I declare under penalty of perjury that the foregoing is true and correct. Executed at New York, New York, June 6, 2007.



Yuliya P. Kuklina